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6 Attorneys for Plaintiff  
United States of America  
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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 GILBERT RAMIREZ and  
MICHAEL VALENTINO LOVATO,  
15 Defendants.  
16

CASE NO. 2:23-CR-00016-TLN  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER  
DATE: June 8, 2023  
TIME: 9:30 a.m.  
COURT: Hon. Troy L. Nunley

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18 STIPULATION

- 19 1. By previous order, this matter was set for status on June 8, 2023.
- 20 2. By this stipulation, defendants now move to continue the status conference until August  
21 31, 2023, at 9:30 a.m., and to exclude time between June 8, 2023, and August 31, 2023, under Local  
22 Code T4.
- 23 3. The parties agree and stipulate, and request that the Court find the following:
  - 24 a) The government has represented that the discovery associated with this case  
25 includes over 450 pages, including law enforcement reports, criminal history reports, and  
26 recorded phone calls and text messages. All of this discovery has been either produced directly to  
27 counsel and/or made available for inspection and copying.
  - 28 b) Counsel for defendants desire additional time to consult with their clients, review

1 the discovery and the charges, and otherwise prepare for trial.

2 c) Counsel for defendants believe that failure to grant the above-requested  
3 continuance would deny them the reasonable time necessary for effective preparation, taking into  
4 account the exercise of due diligence.

5 d) The government does not object to the continuance.

6 e) Based on the above-stated findings, the ends of justice served by continuing the  
7 case as requested outweigh the interest of the public and the defendant in a trial within the  
8 original date prescribed by the Speedy Trial Act.

9 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
10 et seq., within which trial must commence, the time period of June 8, 2023 to August 31, 2023,  
11 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
12 because it results from a continuance granted by the Court at defendant's request on the basis of  
13 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
14 of the public and the defendant in a speedy trial.

15 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
16 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
17 must commence.

18 IT IS SO STIPULATED.

19  
20 Dated: June 5, 2023

PHILLIP A. TALBERT  
United States Attorney

21  
22 /s/ EMILY G. SAUVAGEAU  
EMILY G. SAUVAGEAU  
Assistant United States Attorney

23  
24 Dated: June 5, 2023

/s/ Michael Hansen  
Michael Hansen  
Counsel for Defendant  
GILBERT RAMIREZ

1 Dated: June 5, 2023

/s/ Chris Cosca

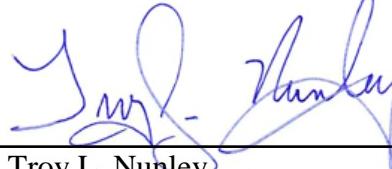
2 Chris Cosca

Counsel for Defendant

3 MICHAEL VALENTINO LOVATO

4 **ORDER**

5 IT IS SO FOUND AND ORDERED this 5<sup>th</sup> day of June, 2023.

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10 Troy L. Nunley  
11 United States District Judge  
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